



F.S. Air Service, Inc.

6121 South Airpark Pl.

Anchorage, AK

DEPT. OF TRANSPORTATION
99502 DOCKETS

June 4, 2002 178800

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Rules Docket (AGC-10)
Federal Aviation Administration
800 Independence Avenue
Washington D.C.
20591

FAA-02-12751-1

To whom it may concern;

I hereby apply for an exemption from FAR 135.143(c) (2) of Title 14, Code of Federal Regulations (14 CFR) so as to allow F.S. Air Service, Inc. to operate with TSO-C74c (Mode C) transponders rather than a TSO-C112 (Mode S) transponder. We have recently purchased an aircraft that was manufactured in October 1993 and equipped with dual Collins TDR-90 transponders, which were built to TSO-C74c.

The FAA promulgated FAR 135.143 (c) (2) in an effort to reduce air traffic control separation standards and thus increase traffic flow. The necessary ground sensors have not become operational, thus there is no potential safety advantage to using Mode S transponders rather than Mode C transponders. Mode S transponders are more expensive to install and to maintain.

Granting this exemption is in the public interest because the exemption would not result in any decrease in aviation safety. Five other aircraft in our fleet are equipped with the same model TSO-C74c transponders. Our company would not have to invest in additional spares, test equipment or training. The position and altitude is displayed to pilots of TCAS equipped aircraft. The continued use of the mode C transponders would still allow ATC to provide greater separation from other air traffic.

Summary:

The petitioner requests authorization to operate it's fleet with the TSO-C74c (Mode C) transponders rather than install a TSO-C112 (Mode S) transponder system.

A Mode S transponder offers no benefit and is more expensive. Because of the additional expense a mode S transponder should not be required. Granting the petition would result in our aircraft and any future acquisitions to continue operating with the original Mode C transponder system.

As the Mode S system is not active in Alaska, granting of the exemption is in the public interest because it would not affect the safety of the traveling public by continuing to operate with the currently installed Mode C system.

Because this petition does not materially differ from numerous petitions that have been granted, I do not believe that publication in the Federal register is required.

Gregory S. Grist
Chief Inspector
F.S. Air Service, Inc.
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Anchorage, AK 99502